

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

**EDITH HUDSON,**

Plaintiff,

vs.

**SMITH DEBNAM NARRON  
DRAKE SAINTSING & MYERS,  
LLP; and DOES 1 through 10,  
inclusive,**

Defendants.

**Civil Action No.:** 3:13-cv-01603-CMC

**PLAINTIFF'S ANSWERS TO  
LOCAL RULE 26.01  
INTERROGATORIES**

Pursuant to LR 26.01, Plaintiff, Edith Hudson, by undersigned  
counsel, states the following:

- (A) State the full name, address, and telephone number of all persons  
or legal entities who may have a subrogation interest in each claim  
and state the basis and extent of said interest.

Answer: None.

- (B) As to each claim, state whether it should be tried jury or nonjury  
and why.

Answer: Each claim in the Complaint should be tried before a jury  
as jury trials are provided for under applicable federal law, and  
Plaintiff desires a trial by jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Answer: The party submitting these responses is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

Answer: The basis for asserting the claim in this division is that a substantial part of the events giving rise to the claims occurred in Richland county.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases

which *may be* related regardless of whether they are still pending.

Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: No.

Date: June 11, 2013

RESPECTFULLY SUBMITTED,

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*Edith Hudson*